

Before the  
Federal Communications Commission  
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of )

1998 Biennial Regulatory Review -- )

Streamlined Contributor Reporting )

Requirements Associated with Administration )

of Telecommunications Relay Services, North )

American Numbering Plan, Local Number )

Portability, and Universal Service Support )

Mechanisms )

CC Docket No. 98-171

**JOINT SUBMISSION OF PROGRAM ADMINISTRATORS  
REGARDING CONSOLIDATED DATA COLLECTION PROCEDURES  
AND COST ALLOCATION METHODOLOGY**

**INTRODUCTION**

On July 14, 1999, the Commission released a Report and Order in CC Docket No. 98-171 which streamlined the revenue reporting requirements for contributors who finance the shared costs of local number portability, administration of the North American Numbering Plan ("NANP"), the interstate Telecommunications Relay Services Fund, and the federal Universal Service Fund. The changes will take effect beginning with the submission by service providers of the FCC Form 499A due on April 1, 2000.<sup>1</sup> In the Order, the Commission directed the program administrators to develop efficient and effective procedures for collecting, validating, and distributing the centrally-filed contributor data among themselves, and to file with the Common Carrier Bureau a summary of their proposed procedures for distributing the data from the worksheet within 90 days after release of the

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<sup>1</sup> 1998 Biennial Regulatory Review Streamlined Contributor Reporting Requirements Associated with Administration of Telecommunications Relay Services, North American Numbering Plan, Local Number Portability, and Universal Service Support Mechanisms, *Report and Order* in CC Docket No. 98-171, FCC 99-175 (July 14, 1999).

Order. Additionally, the Order requires the program administrators to include in their filed summary a description of how related costs will be equitably apportioned.

The program administrators, Lockheed Martin-IMS (the local number portability administrator), the North American Numbering Plan Billing and Collection Agent ("NBANC"), the National Exchange Carrier Association, Inc. ("NECA") (the Telecommunications Relay Services Fund administrator), and the Universal Service Administrative Company ("USAC") (the federal Universal Service Fund administrator), collectively referred to as "the program administrators", submit this filing pursuant to the Commission's July 14, 1999 Order. The program administrators believe that a central data collection agent will be the most efficient and cost-effective vehicle for implementing the FCC's consolidated revenue data collection procedures. Set forth below are the responsibilities of the Data Collection Agent ("DCA") and a proposed methodology for allocating the costs of the DCA's functions to the various programs.<sup>2</sup>

#### **DATA COLLECTION AGENT RESPONSIBILITIES**

The program administrators have determined that the DCA will be responsible for maintaining an accessible database of contributor key identifier data, contributor name and address information. The DCA's duties include primary responsibility for the identification of new contributors, as well as tracking of contributor mergers and dissolutions. The DCA will be responsible for key identifier code assignment and maintenance as well.

The DCA will distribute the data collection form (FCC Form-499) to the industry in sufficient time to allow for accurate responses, will respond to industry inquiries regarding

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<sup>2</sup> USAC is filing today a letter to the Commission covering which entity should serve as the DCA. See letter from Robert Haga, USAC VP of Operations to Secretary of the Commission (October 12, 1999).

the form and the data to be reported, and will serve as a single point of collection and processing of the data collected.

The DCA will analyze the reported revenue information, and will perform any necessary follow-up activity associated with questionable or missing data. The DCA will also perform any required follow-up activity with non-respondents and late filers.

The DCA will provide monthly reports concerning contributor revenue information to programmatic billing and collection units. These reports will identify late filers and will set forth the assessment of late charges, if applicable. These reports also will estimate revenue for entities that have not yet filed their FCC Form-499s. The DCA will serve as the primary point of contact with the Commission regarding the revenue information reported.

### **COST ALLOCATION**

With respect to the sharing of costs of the DCA function, the program administrators have agreed to a simple allocation methodology that equitably distributes costs among the four programs. In the past, each entity collected the revenue data associated with its program. USAC was required to collect data twice annually, while the other entities each collected data annually. Since this resulted in five data collections per year, the program administrators believe that an equitable sharing of costs would result from two-fifths of the cost of the DCA being borne by USAC, with each of the other program administrators being assigned one-fifth of the DCA's costs.<sup>3</sup> Other cost allocation methodologies could produce a more precise assignment of cost to each program; however, the program administrators believe that the time associated with development of such a mechanism and the review of the results generated by such a process would be more constructively spent in carrying out their

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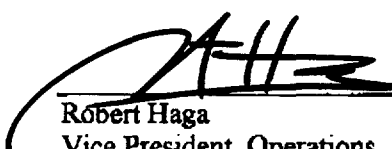
<sup>3</sup> This would include the costs of any audit of the DCA's operation, since each program relies on the results of the DCA's operation as the basis for funding.

programmatic responsibilities. Any extra-ordinary costs that might need to be incurred (e.g., system modifications) would require prior agreement of the program administrators.

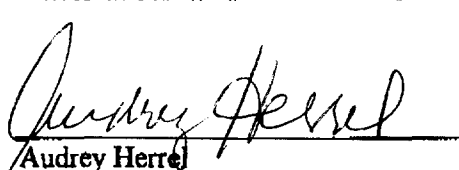
### CONCLUSION

The undersigned parties agree that the procedures and cost allocation methodology described herein represent a straightforward process for successful implementation of the Commission's Streamlined Contributor Reporting Requirements.

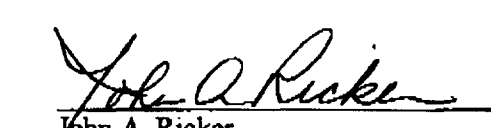
Respectfully Submitted,



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Chief Executive Officer  
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and Collection Agent

October 12, 1999